

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

ALLIANCE FOR HIPPOCRATIC MEDICINE,
et al.,

CASE NO. 2:22-cv-00223-z

Plaintiffs,

v.

U.S. FOOD AND DRUG ADMINISTRATION,
et al.,

Defendants.

**UNOPPOSED MOTION OF THE AMERICAN CENTER FOR LAW AND JUSTICE
FOR LEAVE TO FILE AMICUS CURIAE BRIEF IN SUPPORT OF
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

Pursuant to Fed. R. Civ. P. 7 and Local Rules 7.1 and 7.2, movant – and prospective amicus curiae – the American Center for Law and Justice (ACLJ) hereby respectfully moves the Court for leave to file the accompanying amicus curiae brief in support of Plaintiffs' motion for preliminary injunction. This motion is unopposed as noted in the below certificate of conference.

The ACLJ is an organization dedicated to the defense of constitutional liberties secured by law, including the defense of the sanctity of human life. Counsel for the ACLJ have presented oral argument, represented parties, and submitted amicus curiae briefs before the Supreme Court of the United States and numerous state and federal courts in cases involving a variety of issues, including abortion-related cases. *See, e.g., Pleasant Grove City v. Summum*, 555 U.S. 460 (2009); *Dobbs v. Jackson Women's Health Org.*, 142 S. Ct. 2228 (2022); *June Medical Servs. v. Russo*, 140 S. Ct. 2103 (2020); *Whole Woman's Health v. Hellerstedt*, 579 U.S. 582 (2016); *Gonzales v. Carhart*, 550 U.S. 124 (2007); *Schenck v. Pro-Choice Network*, 519 U.S. 357 (1997); *Whitmer v. Linderman*, No. 164256 (Mich. Sup. Ct. 2022); *Oklahoma Call for Reprod. Justice v. O'Connor*, No. 120543 (Okla.

Sup. Ct. 2022). The ACLJ offers the present brief to add perspective on the consequences of relaxing the availability of abortion medications. In particular, this brief details the ways in which abortion in general – and abortion pills in particular – facilitate, not women’s empowerment, but exploitation of women by third parties for their own selfish interest. The ACLJ seeks this Court’s leave to file its amicus brief in support of Plaintiffs’ motion for preliminary injunction.

Accordingly, for the above-stated reasons, the ACLJ respectfully requests that this Court enter an order granting this motion and filing the accompanying amicus brief in the docket of this case. A proposed order accompanies this motion.

Respectfully submitted,

/s/Edward L. White

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* not admitted in this jurisdiction

Dated: February 10, 2023

CERTIFICATE OF CONFERENCE UNDER LOCAL RULE 7.1

Before filing this motion, the undersigned conferred with counsel for Plaintiffs, Defendants, and Intervenor Danco Laboratories. On February 4, 2023, counsel for Plaintiffs authorized the undersigned to state that Plaintiffs do not oppose the motion. On February 3, 2023, counsel for Defendants authorized the undersigned to state that Defendants consent to the filing of an amicus brief on or before February 10th. On February 4, 2023, counsel for Intervenor authorized the undersigned to state that it does not oppose this motion.

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CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2023, the above motion and the accompanying amicus curiae brief and proposed order were filed with this Court via the CM/ECF system, which will send notice of said filing to all counsel of record.

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